| 1<br>2<br>3<br>4<br>5<br>6<br>7<br>8 | GIA N. MARINA Nevada Bar No. 15276 CLARK HILL PLLC 1700 South Pavilion Center Drive, Suite 500 Las Vegas, Nevada 89135 E-mail: gmarina@clarkhill.com Telephone: (702) 862-8300 Facsimile: (702) 778-9709 Attorney for Defendant National Consumer Telecom & Utilities Exchange, Inc.  UNITED STATES DISTRICT COURT DISTRICT OF NEVADA |   |  |
|--------------------------------------|---|---|--|
| 9                                    | MARILEA ELLIS,  | Case No. 2:23-cv-00354-CDS-VCF                            |  |
| 11                                   | Plaintiff,  |   |  |
| 12                                   | vs.   | JOINT MOTION FOR EXTENSION OF TIME FOR DEFENDANT NATIONAL |  |
| 13                                   | <br> EQUIFAX INFORMATION SERVICES, LLC;   | CONSUMER TELECOM & UTILITIES                              |  |
| 14                                   | EXPERIAN INFORMATION SOLUTIONS, (INC.; NATIONAL CONSUMER TELECOM  | EXCHANGE, INC. TO FILE ANSWER                             |  |
| 15                                   | & UTILITIES EXCHANGE, INC.;<br>COMENITY CAPITAL BANK N.A.; PETAL  | FIRST REQUEST   |  |
| 16                                   | CARD, INC.; SYNCHRONY FINANCIAL;  |   |  |
| 17                                   | FIRST PREMIER BANK DBA PREMIER   BANKCARD, LLC; TORONTO-DOMINION  |   |  |
| 18                                   | BANK, USA, N.A. DBA TD BANK GROUP and CITIGROUP FINANCIAL PRODUCTS,   |   |  |
| 19                                   | INC., DBA CITIBANKS CBNA,   |   |  |
| 20                                   | Defendants.   |   |  |
| 21                                   |   |   |  |
| 22                                   | Defendant National Consumer Telecom & Utilities Exchange, Inc. ("NCTUE") has  |   |  |
| 23                                   | requested an extension of time to answer, move or otherwise respond to the Complaint in this  |   |  |
| 24                                   | matter, to which Plaintiff has no opposition. Accordingly, pursuant to LR IA 6-2, IT IS HEREBY  |   |  |

requested an extension of time to answer, move or otherwise respond to the Complaint in this matter, to which Plaintiff has no opposition. Accordingly, pursuant to LR IA 6-2, IT IS HEREBY STIPULATED AND AGREED to by and among counsel, that Defendant NCTUE's time to answer, move or otherwise respond to the Complaint in this action is extended from April 5, 2023 through and including **May 5, 2023**. The request was made by NCTUE so that it can have an opportunity to collect and review its internal files pertaining to the allegations in the Complaint, and Plaintiff

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| 1  | approves. This stipulation is filed in good faith and not intended to cause delay.   |  |
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| 2  | Respectfully submitted, this 28 <sup>th</sup> day of March, 2023.  |  |
| 3  |  |  |
| 4  | CLARK HILL PLLC  | N  |
| 5  |  | No opposition  |
| 6  | By: <u>/s/Gia N. Marina</u> Gia N. Marina  | <u>/s/Gerardo Avalos</u><br>George Haines, Esq.            |
| 7  | Nevada Bar No. 15276<br>1700 South Pavilion Center Drive, Suite 500  | Nevada Bar No. 9411<br>Gerardo Avalos, Esq.                |
| 8  | Las Vegas, Nevada 89135<br>Telephone: (702) 862-8300   | Nevada Bar No. 15171<br>FREEDOM LAW GROUP                  |
| 9  | Facsimile: (702) 778-9709 Email: gmarina@clarkhill.com Attorney for Defendant National Consumer Telecom & Utilities Exchange, Inc. | 8985 S. Eastern Ave., Suite 350                            |
| 10 |  | Henderson, NV 89123<br>Phone: (702) 880-5554               |
| 11 |  | Fax: (702) 385-5518<br>Email: ghaines@freedomlegalteam.com |
| 12 |  | Email: gavalos@freedomlegalteam.com                        |
| 13 |  | Attorneys for Plaintiff                                    |
| 14 |  |  |
| 15 | IT IS SO ORDERED:  |  |
| 16 | Cantack  |  |
| 17 | United States Magistrate Judge   |  |
| 18 | DATED: 3-29-2023   |  |
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**CERTIFICATE OF SERVICE** I hereby certify that a true and exact copy of the foregoing has been served this 28th day of March, 2023, via CM/ECF, upon all counsel of record: By: /s/ Gia N. Marina Gia N. Marina Nevada Bar No. 15276 1700 South Pavilion Center Drive, Suite 500 Las Vegas, Nevada 89135 Telephone: (702) 862-8300 Facsimile: (702) 778-9709 Email: gmarina@clarkhill.com